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11 **UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION**

14 IN RE PG&E CORPORATION, PACIFIC
15 GAS AND ELECTRIC COMPANY,

16 Bankruptcy Case No. 19-30088 (DM)

17 Chapter 11

18 (Lead Case)
19 (Jointly Administered)

20 Reorganized Debtors,

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 **JOINDER OF THE MINNESOTA STATE BOARD OF INVESTMENT IN LEAD
25 PLAINTIFF PERA AND THE SECURITIES ACT PLAINTIFFS' RESPONSE AND
26 OPPOSITION TO THE REORGANIZED DEBTORS' THIRTY-THIRD SECURITIES
27 OMNIBUS CLAIMS OBJECTION**

The Minnesota State Board of Investment (“MSBI”) hereby submits this joinder (the “Joinder”) in Lead Plaintiff PERA and the Securities Act Plaintiffs’ Response and Opposition to the Reorganized Debtors’ Thirty-Third Securities Omnibus Claims Objection (ECF No. 14342) (the “Opposition”). In support hereof, MSBI states as follows:

BACKGROUND

1. MSBI is a Securities Claimant that timely filed proofs of claim against PG&E Corporation (“PG&E”) and Pacific Gas and Electric Company (“Pacific Gas”) in accordance with the Extended Bar Date Order. Specifically, MSBI timely filed Claim No. 101042 against PG&E and Claim No. 101117 against Pacific Gas. On October 11, 2023, MSBI filed amendments to Claim Nos. 101042 and 101117 adopting the allegations in the Third Amended Consolidated Class Action Complaint for the Violation of the Federal Securities Laws (ECF No. 121) filed in *In re PG&E Corp. Sec. Litig.*, No. 3:18-cv-03509 (N.D. Cal.) (the “PERA Complaint”), except the PERA Complaint’s allegations concerning the plaintiffs in that action (Claim Nos. 110026 and 110027, respectively).

2. On December 13, 2023, the Debtors filed the 33rd Omnibus Claim Objection (the “Objection”) [Dkt. No. 14200], which seeks dismissal of the claims filed by numerous Securities Claimants including MSBI.

3. The factual and legal elements of Securities Claimants' claims, such as the falsity of Debtors' statements, the scienter of Debtors and their officers in making those statements, whether Debtors' false statements caused the Securities Claimants' damages, and the amount of damages per share of PG&E common stock, are common to all Securities Claimants.

JOINDER

4. For the foregoing reasons and the reasons set forth in the Opposition, MSBI hereby joins in all of the arguments contained in the Opposition in all respects, and adopts and incorporates them herein by reference.

CONCLUSION

5. For the reasons set forth herein and in the Opposition, MSBI joins in the Opposition and asks that this Court enter an Order denying the Objection.

1 Dated: March 15, 2024

Respectfully submitted,

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**BERNSTEIN LITOWITZ BERGER
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